

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE EX PARTE APPLICATION OF SPS I
FUNDO DE INVESTIMENTO DE AÇÕES –
INVESTIMENTO NO EXTERIOR FOR AN
ORDER TO TAKE DISCOVERY
PURSUANT TO 28 U.S.C. § 1782

Case No. 1:22-mc-00118-LAK

SUPPLEMENTAL DECLARATION OF LUCAS V.M. BENTO

I, Lucas V.M. Bento, declare as follows:

1. I am an attorney at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Joesley Batista, Wesley Batista, JBS S.A., and J&F Investimentos S.A. (“Intervenors”). I submit this declaration in support of Intervenors’ Reply in Support of Their Motion to Vacate the Court’s April 26, 2022 *Ex Parte* Order Authorizing SPS I Fundo de Investimento de Ações – Investimento no Exterior (“SPS” or “Petitioner”) to Take Discovery Pursuant to 28 U.S.C. § 1782 and to Quash the Subpoenas served on J.P. Morgan Chase Bank, N.A. (“J.P. Morgan”) and Barclays USA, Inc. (“Barclays” and, with J.P. Morgan, “Respondents”) in the above-captioned matter.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the landing page for the International Consortium of Investigative Journalists’ FinCEN Files repository, available at <https://www.documentcloud.org/app?q=%2Bproject%3Afincen-files-50976>, which I caused to be printed on June 28, 2022.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Search Results from the International Consortium of Investigative Journalists’ FinCEN Files repository, available at <https://www.documentcloud.org/app?q=%2Bproject%3Afincen-files-50976>, for “Barclays,” which I caused to be printed on June 28, 2022.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Search Results from the International Consortium of Investigative Journalists' FinCen Files repository, available at <https://www.documentcloud.org/app?q=%2Bproject%3Afincen-files-50976>, for "Unifleisch," which I caused to be printed on June 28, 2022.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the Search Results from the International Consortium of Investigative Journalists' FinCEN Files repository, available at <https://www.documentcloud.org/app?q=%2Bproject%3Afincen-files-50976>, for "Lunsville," which I caused to be printed on June 28, 2022.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Search Results from the International Consortium of Investigative Journalists' FinCEN Files repository, available at <https://www.documentcloud.org/app?q=%2Bproject%3Afincen-files-50976>, for "Valdarco," which I caused to be printed on June 28, 2022.

7. Attached hereto as **Exhibit 6** is a true and correct copy of "*What is the FinCen Files investigation?*," International Consortium of Investigative Journalists, (Sept. 20, 2020), available at <https://www.icij.org/investigations/fincen-files/what-is-the-fincen-files-investigation/>, which I caused to be printed on June 30, 2022.

8. Attached hereto as **Exhibit 7** is a true and correct copy of "*Former Senior Fincen Employee Pleads Guilty To Conspiring To Unlawfully Disclose Suspicious Activity Reports*," U.S. Department of Justice, (Jan. 13, 2020), available at <https://www.justice.gov/usao-sdny/pr/former-senior-fincen-employee-pleads-guilty-conspiring-unlawfully-disclose-suspicious>, which I caused to be printed on June 30, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 30, 2022.

/s/ Lucas V.M. Bento

Lucas V.M. Bento